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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

A.J.P. and A.M.P., minors by and
through their guardian ad litem Cynthia
Nunez, individually and as successor in
interest to Albert Perez, deceased; and
PATRICIA RUIZ, individually,

Plaintiffs,

v.

COUNTY OF SAN BERNARDINO;
DAVID MOORE, CORY MCCARTHY,
CHRISTINA OLIVAS, ANDREW
POLLOCK, and DOES 5-10, inclusive,

Defendants.

Case No. 5:22-CV-01291 SSS (SHKx)
Hon. Judge Sunshine S. Sykes,
Hon. Mag. Shashi H. Kewalramani

**JOINT STIPULATION TO
CONTINUE LAST DATE TO HEAR
MOTIONS AND HEARING ON
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

*[(Proposed) Order filed concurrently
herewith]*

FPTC: July 12, 2024
Trial: July 29, 2024

TO THIS HONORABLE COURT:

IT IS HEREBY STIPULATED BY AND BETWEEN A.J.P. and A.M.P.,
minors by and through their guardian ad litem CYNTHIA NUNEZ, individually and
as successor in interest to ALBERT PEREZ, deceased; and PATRICIA RUIZ,
individually ("Plaintiffs") and COUNTY OF SAN BERNARDINO; CORY
MCCARTHY, ANDREW POLLOCK; DAVID MOORE, and CRISTINA OLIVAS
("Defendants"), as follows:

GOOD CAUSE STATEMENT:

1. Defendants filed a Motion for Summary Judgment (“MSJ”) on Plaintiffs’ claims on March 1, 2024, and noticed it for the hearing date of April 19, 2024 (Dkt. No. 43);
2. Currently, April 19, 2024 is also the deadline to hear motions for summary judgment and the last date for hearing motions, per the Court’s Scheduling Order (Dkt. No. 41);
3. The parties participated in a mediation with ADR Panel Mediator, Richard Copeland on March 27, 2024. At that time, the parties reached a potential settlement agreement, contingent on the approval of the settlement by the County’s Board of Supervisors, plaintiffs’ execution of a release of claims, and the Court’s approval of a minors’ compromise.
4. Because of this, the parties believe that a short continuance of the April 19, 2024, MSJ hearing is warranted and will provide the parties with sufficient time to determine whether the matter will resolve outside of trial.
5. To avoid wasting valuable time and resources of the Court, the parties, and their counsel, the parties respectfully request that the Court continue the last date to hear motions and the hearing on Defendants’ MSJ from April 19, 2024 to May 17, 2024.
6. It is anticipated that the settlement will be presented to the County’s Board of Supervisors for consideration prior to May 17, 2024.
7. If the matter should resolve before that time, alleviating the need for further litigation, the parties will file a status report, apprising the Court of any developments.

1 Respectfully submitted,

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3 DATED: April 3, 2024

LAW OFFICES OF DALE K. GALIPO

4 By /s/ Dale K. Galipo

5 Dale K. Galipo¹
6 Shannon J. Leap
7 Attorneys for Plaintiffs

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9 DATED: April 3, 2024

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

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12 By /s/ Eugene Ramirez

13 Eugene P. Ramirez, Esq.
14 Lynn Carpenter, Esq.
15 Kayleigh A. Andersen, Esq.
16 Attorneys for Defendants, COUNTY OF
17 SAN BERNARDINO, et al.
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27 ¹ As the filer of this document, I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.